

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

IN RE:	§	District Court Case No. 2-09CV-199-J
RALPH LYLE CRUM	§	(Appeal from Bankruptcy Case No.
	§	08-20297-RLJ-7)
	§	
Debtor	§	
	§	
RALPH LYLE CRUM	§	
	§	
Appellant	§	
	§	
vs.	§	
Kent Ries, Trustee and Randi Crum	§	
	§	
Appellees	§	
	§	

**AGREED MOTION TO EXTEND TIME TO FILE APPELLANT'S BRIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Ralph Lyle Crum, Appellant herein, and joined by Appellees, and would show the court as follows:

1. Appellant and Appellees are in good faith negotiations to resolve all disputes in the appeal.
2. The parties agree that all parties (as well as the unsecured creditors in bankruptcy) would be best served by settlement, rather than expending fees from the bankruptcy estate to litigate the appeal.
3. The parties are in good faith negotiations to resolve the appeal, and believe that a settlement is likely, if appellate attorney's fees may be avoided by settlement.
4. The Appellant's brief is due Monday, August 31, 2009. An extension until September 22, 2009, should be adequate to complete the negotiations.

WHEREFORE, PREMISES CONSIDERED, Ralph Crum, Appellant, prays that the time to file Appellant's Brief be extended until September 22, 2009, and for such other relief to which he may be entitled at law or in equity.

Respectfully submitted,

**NORTHERN LAW FIRM**  
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Van W. Northern

State Bar No. 15101100

*Attorney for Appellant*

**CERTIFICATE OF SERVICE**

The undersigned certifies that he has on the date shown below transmitted a true copy of the foregoing document to the following parties in interest by electronic notification via the court's electronic case filing system or by regular mail on the 27th day of August, 2009:

Kent D. Ries  
600 S. Tyler, Suite 1300  
Box 12058  
Amarillo, Texas 79101  
*Chapter 7 Trustee*

U. S. Trustee  
1100 Commerce Street, Room 9C60  
Dallas, Texas 75242

Cole Young  
Templeton, Smithee, Hayes,  
Heinrich & Russell, L.L.P.  
P.O. Box 15010  
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*Attorney for Randi Crum*

  
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